

EXHIBIT

A

Discovery Motion		Party Who Issued RFP/Subpoena	Briefing Parties	Motion Dkt. No.	Date Motion Filed	Discovery Still at Issue	Additional Notes
1	Motion for Protective Order Regarding Adam Kincaid and NRRT Depositions	LULAC Plaintiffs (for all Private Plaintiffs)	LULAC Plaintiffs, United States	D.D.C., 1:22-mc-67 (Dkt. 1)	7/12/2022	2 depositions	Briefing complete.
2	Motion to Compel Document Subpoenas to Dan Patrick, Joan Huffman, Wade Phelan, Todd Hunter, Ryan Guillen, Jacey Jetton, Brooks Landgraf, and J.M. Lozano	LULAC Plaintiffs, for all Private Plaintiffs	LULAC Plaintiffs	Dkt. 447	7/19/2022	Approximately 1,100 documents	Deadline to file opposition shall be 14 days after the earlier of (i) the Fifth Circuit lifting the stay of Dkt. 467 or (ii) the Fifth Circuit's opinion in <i>LULAC Texas v. Hughes</i> .
3	First Motion to Compel Regarding Legislative Privilege Assertions in Depositions	Private Plaintiffs	Private Plaintiffs	Dkt. 555 (amended)	8/18/2022	16 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with United States' first motion to compel, Dkt. 522.
4	Second Motion to Compel Regarding Legislative Privilege Assertions in Depositions (Joan Huffman, etc.)	Private Plaintiffs	Private Plaintiffs	Dkt. 543	8/15/2022	3 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with United States' second motion to compel, Dkt. 541.
5	Motion to Compel Regarding Legislative Privilege Assertions in Re-opened Depositions of Representatives Hunter and Murr	Private Plaintiffs	LULAC Plaintiffs	Dkt. 638	11/10/2022	2 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with United States' fourth motion to compel, Dkt. 636.
6	Motion to Compel Document Subpoenas to Mike Schofield, Donna Campbell, Paul Bettencourt, Brian Birdwell, Bryan Hughes, Robert Nichols, Jane Nelson, and Charles Perry	LULAC Plaintiffs, for all Private Plaintiffs	LULAC Plaintiffs	Dkt. 540	8/15/2022	Approximately 142 documents	Deadline to file opposition shall be 14 days after the earlier of (i) the Fifth Circuit lifting the stay of Dkt. 467 or (ii) the Fifth Circuit's opinion in <i>LULAC Texas v. Hughes</i> .
7	Motion to Compel Responses from Defendant State of Texas (Office of Attorney General)	LULAC Plaintiffs	LULAC Plaintiffs	Dkt. 548	8/16/2022	Approximately 812 documents	Briefing complete. Seeks same documents as the United States' motion to compel, Dkt. 527.
8	Motion to Compel Regarding Document Subpoena to Anna Mackin	LULAC Plaintiffs	LULAC Plaintiffs	Dkt. 582	9/15/2022	Approximately 197 documents	Deadline to file opposition shall be 14 days after the earlier of (i) the Fifth Circuit lifting the stay of Dkt. 467 or (ii) the Fifth Circuit's opinion in <i>LULAC Texas v. Hughes</i> .
9	Motion to Reopen Senator Huffman Deposition and Compel Deposition Answers	LULAC Plaintiffs	LULAC Plaintiffs	Dkt. 580	9/9/2022	1 deposition	Briefing complete.
10	Motion to Reopen Discovery for the Limited Purpose of Seeking Specific Documents from Dave's Redistricting, LLC	LULAC Plaintiffs	LULAC Plaintiffs	Dkt. 617	10/17/2022	Unknown	Briefing complete.
11	Motion to Compel Deposition Testimony of Senator Birdwell	Texas NAACP	Texas NAACP	Dkt. 645	11/18/2022	1 deposition	Briefing complete.
12	Motion to Enforce Legislators' Document Subpoenas	United States	United States	Dkt. 351	6/17/2022	Approximately 2,000 documents	On appeal; Fifth Circuit stayed the Court's July 25, 2022 Order (Dkt. 467) as to documents over which the legislative privilege was asserted.
13	Renewed Motion to Compel Compliance with Document Subpoenas (Eric Wienckowski and Thomas Bryan)	United States	United States	Dkt. 634	11/9/2022	Approximately 974 documents	Briefing complete.
14	Motion to Enforce Order Compelling the Production of OAG Documents from the State of Texas	United States	United States	Dkt. 527	8/10/2022	Approximately 812 documents	Briefing complete. Seeks same documents as the LULAC Plaintiffs' motion to compel, Dkt. 548.
15	Motion to Compel Compliance with Subpeona to Representative Schofield	United States	United States	Dkt. 532	8/12/2022	Approximately 60 documents	Deadline to file opposition shall be 14 days after the earlier of (i) the Fifth Circuit lifting the stay of Dkt. 467 or (ii) the Fifth Circuit's opinion in <i>LULAC Texas v. Hughes</i> .
16	First Motion to Compel Legislative Deposition Testimony	United States	United States	Dkt. 522	8/8/2022	14 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with Private Plaintiffs' motion to compel, Dkt. 555.
17	Second Motion to Compel Legislative Deposition Testimony (Joan Huffman, etc.)	United States	United States	Dkt. 541	8/15/2022	3 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with Private Plaintiffs' motion to compel, Dkt. 543.
18	Third Motion to Compel Legislative Deposition Testimony (Jeffrey Archer)	United States, Private Plaintiffs	United States, LULAC Plaintiffs (Joiner)	Dkt. 600 (Joiner at Dkt. 602)	9/30/2022	1 deposition	Briefing complete.
19	Fourth Motion to Compel Legislative Deposition Testimony (Re-opened Depos of Todd Hunter and Andrew Murr)	United States	United States	Dkt. 636	11/10/2022	2 depositions	Briefing complete. Substantial overlap of challenged deposition testimony with LULAC Plaintiffs' motion to compel, Dkt. 638.
20	Motion to Compel Texas Legislative Council Documents	United States	United States	Dkt. 644	11/17/2022	Approximately 424 documents	Briefing complete.
21	Motion to Stay Document Subpoena, to Transfer to WDTX, or in the Alternative to Quash Document Subpoena to Dave's Redistricting by Representative Jacey Jetton and Adam Foltz	United States	United States	W.D.W.A., 2:22-cv-1203-JHC (Dkt. 1)	8/12/2022	Unknown	Briefing complete. On November 11, 2022, the Court directed the parties to submit a joint status report every 90 days regarding the status of the underlying redistricting case, or within five days of the occurrence of any significant case development. Dkt. 19.